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July 5, 2005

Via Facsimile and First Class Mail

Mr. Jeff Turner
Massachusetts Commission Against Discrimination
One Ashburton Place, Rm. 601
Boston, MA 02108
617-994-6024 (fax)

Re: Public Records Request

Dear Mr. Turner:

Thank you for the list of charges of discrimination filed against OneBeacon Insurance Company ("OneBeacon"), formerly known as Commercial Union Insurance Company and CGU Insurance Company.

As counsel for OneBeacon, I understand that I am entitled to a copy of all documents contained in the file including rebuttals, the investigative record, and the memorandum of fact and law pursuant to the Massachusetts public records law, G.L. c. 66, §10. Accordingly, please forward to me the charge, position statement, memorandum of fact and law and any other written submissions to the Commission by either complainant or respondent in the following matters:

- 1) Lauren MacEachern v. Commercial Union Insurance Co.
Docket Number 94-131676, Filed 8/25/94, Closed 1/28/99;
- 2) Linda Cruz v. Commercial Union Insurance Co.
Docket Number 96-133890, Filed 11/7/96, Closed 3/24/97;
- 3) Michael Croce, Jr. v. Commercial Union Insurance Co.
Docket Number 98-130344, Filed 2/3/98, Closed 8/11/98;

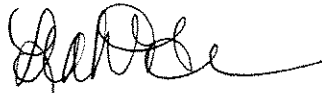
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- 4) Richard O'Donnell v. Commercial Union Insurance Co.
Docket Number 98-132342, Filed 7/17/98, Closed 12/27/00;
- 5) William Fennell v. CGU Insurance
Docket Number 99-130201, Filed 1/25/99, Closed 6/13/00; and
- 6) Andrew Gerard v. OneBeacon Insurance Co.
Docket Number 03-1301367, Filed 5/21/03, Closed 9/4/03.

Thank you for your attention to this matter. Please feel free to contact me if you need additional information in order to process this request.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Leah M. Moore', with a long horizontal flourish extending to the right.

Leah M. Moore

cc: Joan Geddes, Esq.
Keith B. Muntyan, Esq.